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**PROPOSED COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 20-32455-11
WILDCATTER DISPOSAL, LLC	§	
	§	Chapter 11
Debtor.	§	

WITNESS AND EXHIBIT LIST

Wildcatter Disposal, LLC (the “Debtor” or “Wildcatter”), debtor and debtor in possession in the above-referenced case, files this Witness and Exhibit List in connection with the September 30, 2020 hearing on Debtor’s Emergency Motion to Determine Estate Property and Confirm Automatic Stay [Docket No. 2] before the Honorable Harlin D. Hale, United States Bankruptcy Judge, via Webex.¹

- I. **Witnesses.** The Debtor may call the following witnesses:
- a. Randy Edwards
 - b. Any and all witnesses designated and/or called by any party in interest; and/or
 - c. Any and all necessary rebuttal and/or impeachment witnesses.

¹ The Webex hearing link will be posted to Judge Hale's webpage prior to the hearing and may be accessed here: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>. Parties are instructed to review the Webex information filed at Docket No. 7 prior to the hearing.

II. **Exhibits.** The Debtor may seek the introduction of the following exhibits:

EXHIBIT NUMBER	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E
D-1	Debtor's Emergency Motion to Determine Estate Property and Confirm Automatic Stay [Docket No. 2] (" Motion to Determine ")					
D-2	Proposed Order, filed as Exhibit A to Motion to Determine [Doc. No. 2-1]					
D-3	April 14, 2018, Lease and Purchase Agreement executed by Debtor and Borden County Waste Disposal Ltd, filed as Exhibit B to Motion to Determine [Doc. No. 2-2]					
D-4	November 20, 2019 First Amendment to Lease and Purchase Agreement executed by Debtor and Borden County Waste Disposal Ltd, filed as Exhibit C to Motion to Determine [Doc. No. 2-3]					
D-5	August 10, 2020 Term Sheet executed by Debtor and Barbwire Oil & Gas, LLC, filed as Exhibit D to Motion to Determine [Doc. No. 2-4]					
D-6	August 26, 2020 Termination Letter, filed as Exhibit E to Motion to Determine [Doc. No. 2-5]					
D-7	Texas Railroad Commission Pit Permit No. P010469					
	Any exhibits designated by any other party					
	Any rebuttal exhibits					

Debtor reserves the right to amend this Witness and Exhibit List at any time prior to the hearing.

Dated: September 28, 2020

/s/ Megan F. Clontz

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on the parties listed on the attached service list via the electronic means listed and via ECF to all parties electing service through such means on September 28, 2020.

/s/ Megan F. Clontz

Megan F. Clontz